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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 12-0193 WHA
)	
Plaintiff,)	STIPULATION AND PROPOSED
)	ORDER EXCLUDING TIME BETWEEN
v.)	APRIL 17, 2012 AND APRIL 24, 2012
)	FROM CALCULATIONS UNDER THE
MAHER WALID KHATIB,)	SPEEDY TRIAL ACT (18 U.S.C. § 3161)
)	
)	
Defendant.)	
)	

The defendant, Maher Walid Khatib, represented by Shawn Halbert, Assistant Federal Public Defender, and the government, represented by Cynthia Frey, Assistant United States Attorney, appeared before this Court on April 17, 2012 for a status conference. The defendant requested and the Court ordered a continuance to April 24, 2012 for a change of plea or status conference.

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STIPULATION AND ~~PROPOSED~~ ORDER EXCLUDING TIME
CR 12-0193 WHA

1 The parties agreed that time be excluded under the Speedy Trial Act between April 17,
2 2012 and April 24, 2012 for purposes of effective preparation of counsel, in order to provide
3 defense counsel with adequate time to review the discovery and consult with the defendant.

4 In addition, the defendant agrees to exclude for this period of time any time limits
5 applicable under 18 U.S.C. § 3161. The parties represent that granting the continuance, in order
6 to provide defense counsel with adequate time to review the discovery and consult with the
7 defendant, is necessary for continuity of defense counsel and effective preparation, taking into
8 account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties also agree that
9 the ends of justice served by granting such a continuance outweigh the best interests of the
10 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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12 SO STIPULATED:

13 MELINDA HAAG
14 United States Attorney

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16 DATED: April 24, 2012

17 /s/
CYNTHIA M. FREY
Assistant United States Attorney

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19 DATED: April 24, 2012

20 /s/
SHAWN HALBERT
Attorney for MAHER WALID KHATIB

1 Based upon the representation of counsel and for good cause shown, the Court finds that
2 failing to exclude the time between April 17, 2012 and April 24, 2012 would unreasonably deny
3 the defendant continuity of counsel and would deny counsel the reasonable time necessary for
4 effective preparation, taking into account the exercise of due diligence. 18 U.S.C.

5 § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the
6 time between April 17, 2012 and April 24, 2012 from computation under the Speedy Trial Act
7 outweigh the best interests of the public and the defendant in a speedy trial.

8 Therefore, IT IS HEREBY ORDERED that the time between April 17, 2012 and April
9 24, 2012 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.
10 § 3161(h)(7)(A) and (B)(iv).

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12 DATED: April 24, 2012.



13 William Alsup
14 UNITED STATES DISTRICT JUDGE
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